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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 08-44739 RLE

**DAVID WAYNE TRIMBLE and
MARY LYNN TRIMBLE,**

Chapter 13

Debtors.

**MOTION TO MODIFY CHAPTER 13 PLAN;
NOTICE TO CREDITORS OF
DEADLINE TO REQUEST A HEARING**

The above-named debtors apply to the court for an order to modify their Chapter 13 Plan as follows:

Debtors' May 2011, plan payment shall be suspended. Beginning June 2011 and continuing thereafter debtors will pay \$400.00 per month to the Trustee. Any plan arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds:
Debtors incurred costly unforeseen medical bills in the previous months.

NOTICE IS HEREBY GIVEN:

(i) That Local Rule 9014-1 of the United States Bankruptcy Court for the Northern District of California prescribes the procedures to be followed and that any objection to the requested relief, or a request for

1 hearing on the matter must be filed and served upon the undersigned
2 within twenty one (21) days of mailing of this notice;

3 (ii) That a request for hearing or objection must be accompanied
4 by any declarations or memoranda of law the party objecting or requesting
5 wishes to present in support of its position;

6 (iii) That if there is not a timely objection to the requested
7 relief or a request for hearing, the Court may enter an order granting
8 the relief by default; and

9 (iv) That the undersigned will give at least seven (7) days written
10 notice of hearing to the objecting or requesting party, and to any
11 trustee or committee appointed in the case, in the event an objection or
12 request for hearing is timely made.

13 Dated: May 18, 2011

14 /s/ Patrick L. Forte
15 PATRICK L. FORTE
16 Attorney for Debtors
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